

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

v.

19-CR-227  
23-CR-37

PETER GERACE, JR.,

Defendant.

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**NOTICE OF MOTION FOR FORFEITURE OF PROPERTY**

PLEASE TAKE NOTICE, the United States of America, by its attorney, Michael DiGiacomo, United States Attorney for the Western District of New York, Elizabeth M. Palma, Assistant United States Attorney, of counsel, respectfully moves this Court pursuant to Rule 32.2(b) of the Federal Rules of Criminal Procedure, Title 18, United States Code, Section 1594(d)(1), and Title 21, United States Code, Section 853(a)(2), for a Preliminary Order of Forfeiture. In support of this motion, the United States submits a Memorandum of Law.

Dated: May 28, 2025,  
Buffalo, New York

MICHAEL DiGACOMO  
United States Attorney  
Western District of New York

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